



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 4**

**ATLANTA FEDERAL CENTER**

**61 FORSYTH STREET**

**ATLANTA, GEORGIA 30303-8960**

**AUG 26 2016**

**CERTIFIED MAIL** 7011 3500 0003 2064 3650

**RETURN RECEIPT REQUESTED**

Royal Ten Cate (USA) Incorporated  
ATTN: Mr. Kevin Cook  
365 South Holland Drive  
Pendergrass, Georgia 30567-4625

Re: Information Request Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, for Royal Ten Cate (USA) Incorporated, Pendergrass, Jackson County, Georgia

Dear Mr. Cook:

On September 29, 2015, the U.S. Environmental Protection Agency Region 4 performed an inspection of Royal Ten Cate (USA) Incorporated's facility (Facility) located at 365 South Holland Drive in Pendergrass, Jackson County, Georgia. The purpose of the inspection was to evaluate Royal Ten Cate (USA) Incorporated's compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); and the regulations promulgated thereunder at 40 C.F.R. Part 403 and the State of Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6.

The EPA is providing the enclosed Inspection Report describing specific observations made at the Facility during the inspection (See Enclosure A). The EPA is continuing to investigate the Facility's compliance with the CWA. Therefore, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that Royal Ten Cate (USA) Incorporated provide the information set forth in Enclosure B within ninety (90) calendar days of your receipt of this letter.

Royal Ten Cate (USA) Incorporated's response should be submitted to:

Mr. David R. Phillips  
U.S. Environmental Protection Agency, Region 4  
NPDES Permitting and Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

Failure to provide a full and complete response to this information request or to adequately justify a failure to respond within the time frame specified above may result in an EPA enforcement action pursuant to federal law, including, but not limited to Section 309 of the Clean Water Act, 33 U.S.C. § 1319, and 18 U.S.C. § 1001.

If Royal Ten Cate (USA) Incorporated believes that any of the requested information constitutes confidential business information, it may assert a confidentiality claim with respect to such information,

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except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure C.

All information submitted in response to this information request must be accompanied by the following certification that is signed by a duly authorized official in accordance with 40 C.F.R. § 403.12(l):

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Please be aware that the EPA may use information in response to this information request in any enforcement proceeding related to this matter.

In addition, the Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist Royal Ten Cate (USA) Incorporated, the EPA has also enclosed a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings*.

The EPA appreciates your prompt attention to this matter. Should you have any questions regarding this letter, please contact Mr. David Phillips at (404) 562-9773. Legal inquiries should be directed to Ms. Mita Ghosh, Associate Regional Counsel, at (404) 562-9568.

Sincerely,



Denisse D. Diaz, Chief  
NPDES Permitting and Enforcement Branch  
Water Protection Division

Enclosures

cc: Mr. Bert Langley, Director of Compliance  
Georgia Environmental Protection Division

**Final Report**  
**TenCate Geosynthetics**  
**Industrial User Pretreatment Reconnaissance Inspection**  
**September 29, 2015**

**Prepared for:**  
**EPA Region 4**  
**61 Forsyth Street, S.W.**  
**Atlanta, GA 30303-8960**

**Prepared by:**  
**PG Environmental, LLC**  
**607 10th Street; Suite 307**  
**Golden, CO 80401-5817**

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## I. Introduction

On September 29, 2015, PG Environmental, LLC (hereinafter, PG) conducted a pretreatment reconnaissance inspection of the TenCate Geosynthetics facility (hereinafter, TenCate or facility) on behalf of U.S. Environmental Protection Agency (EPA) Region 4. The facility location and its mailing address are the same: 365 South Holland Drive; Pendergrass, GA 30567. The facility does not have an industrial user discharge permit from either the State of Georgia Environmental Protection Division (State of Georgia) or the City of Pendergrass; however, publicly available information about the facility suggested a potential need for coverage under a control mechanism. The State of Georgia was notified in advance of the pretreatment reconnaissance inspection activity pursuant to its memorandum of agreement with the EPA.

The facility is located in an industrial park at the end of a cul-de-sac off of South Holland Drive. TenCate occupies the entirety of the warehouse in addition to a parking lot, an outdoor loading dock, and storage area located to the southwest of the warehouse. The facility is located at latitude and longitude 34.148164 and -83.657651, respectively. A photograph of the facility's entrance sign is provided in Attachment 1 (refer to Attachment 1, Photograph 1).

## II. Entry

On behalf of EPA Region 4, PG Inspector, Ms. Kettie Holland, arrived at the facility at 1:03 P.M. Ms. Holland entered the lobby area of the facility and used a facility telephone and directory to contact the facility's Environmental, Health, and Safety (EHS) Manager. The EHS Manager did not answer, and Ms. Holland then called another phone number in the directory and informed the facility representative of the reason for her visit and the purpose of the inspection. Ms. Holland asked whom the appropriate person would be to meet with to discuss facility operations and wastewater-generating operations. The facility representative stated that the EHS Manager, Mr. Kevin Cook would be the best person; however, Mr. Cook was not onsite at the time of the inspection. Therefore, Ms. Holland met with Mr. Darrel McMahan, the Maintenance Manager; introductions were exchanged and Ms. Holland provided a preliminary explanation of the purpose of the inspection.

## III. Opening Conference

Mr. McMahan and Ms. Holland entered the administrative area of the facility. Ms. Holland presented her inspection credentials and provided a full explanation of the purpose and intent of the pretreatment reconnaissance inspection. Ms. Holland requested that Mr. McMahan provide a description of the facility's onsite operations and wastewater generating processes. Mr. McMahan explained that TenCate has been operating at the facility since 1994. Mr. McMahan continued to explain that the company is Dutch-owned and that the facility was recently purchased by a new company in Holland.

Mr. McMahan explained the facility's operations and process flow from raw materials to finished product. Mr. McMahan stated that the facility manufactures nonwoven geosynthetic

textiles utilizing polypropylene resins. Mr. McMahan explained that the facility is comprised of one building with an administrative area and a manufacturing area.

Mr. McMahan explained that the facility has “air handlers” which are on a closed-loop chiller system and that wastewater is not discharged from this process but is continuously recycled. Mr. McMahan was not aware if the facility had a wastewater discharge permit and was also unaware if representatives from the City of Jefferson (City) had been to the facility to conduct an inspection pertaining to wastewater generating and discharge practices.

#### IV. Tour of Operations

Mr. McMahan accompanied Ms. Holland on the inspection of the facility’s process area, which is located in a single warehouse. Mr. McMahan explained that raw materials consist of virgin resins in the form of plastic pellets which arrive at the facility via railcar or truck, and are stored in silos within the process area.

Mr. McMahan explained that the facility has two extruder lines and the raw materials are vacuumed to the extruders. Once in the extruders, the polypropylene filament is extruded from the raw material and a low concentration of finishing oil is applied to the filament.

Mr. McMahan explained that the facility has an air handler that is on a closed-loop chilling system (refer to Attachment 1, Photographs 2 and 3). The chillers for the air handler are located outside of the facility (refer to Attachment 1, Photograph 4). Mr. McMahan explained that the chillers create cool water that is fed through the air handler by a series of pipes on a closed loop system. The water from the air handler is collected and pumped through a filter and back through the chiller to deliver cool water to the air handler. Mr. McMahan explained that wastewater discharge is not created from this process.

Mr. McMahan explained that the polypropylene filaments are transported over a series of rollers, heated, and transported over another series of rollers to the crimper machine. At the crimper machine, the shape and texture of the filament is changed. Condensate from the crimper machine is discharged to a floor drain (refer to Attachment 1, Photographs 5 through 7). After the crimping process, finishing oil is applied to the polypropylene filament and it is processed through a series of cutting wheels that cut the filament to a desired specification. Mr. McMahan explained that the polypropylene filaments are then either sent to the bailing machine or to the “non-woven” area of the facility for further processing.

Mr. McMahan explained that edge trim and leftover polypropylene filament are ground, re-pelletized and are reused for the production of similar products. Likewise, off-specification products are collected, cut, and transported by a conveyor to a recycling bin where the filaments are re-processed. Mr. McMahan explained that the filaments are cut using “knives” to grind the material. After the grinding, the filament is reprocessed in the extruder and is sent through a screen changer (a filter for removing contaminants such as wood and debris). The filament goes through a process in which it is ground with a cutter knife and water is added to solidify the ground filaments to produce pellets. The pellets are then transported via a tray with water to a Next Generation Group (NGR) recycling machine where the pellets are rinsed and then sent

through a shaker and dryer system. Mr. McMahan explained that water is recycled throughout the process. Specifically, the water from the pellet rinse process is collected and pumped to the cutter knife machine and is applied to the ground filament for solidification. The overflow from the NGR machine is discharged to a nearby floor drain (refer to Attachment 1, Photographs 8 and 9). Mr. McMahan also explained that a vacuum pump is connected to the extruder barrel and a bucket is placed near the vacuum pump to collect steam condensate from the extrusion process (refer to Attachment 1, Photographs 10 and 11). Mr. McMahan explained that when the bucket is full it is discharged to a floor drain.

Mr. McMahan and Ms. Holland proceeded to another process area of the facility that contained a washing unit. Mr. McMahan explained that the facility utilizes an oven in which it heats the breaker plates and dye plates (used in the synthetic fiber manufacturing process) in order to remove the polypropylene that may be stuck to the plates. The plates then go through a three-stage ultrasonic washing process that uses Metal Medic 7055 (an alkaline liquid rust and carbon remover). Mr. McMahan was not sure if the wastewater was discharged to the publically owned treatment works (POTW) from this process. It appeared to Ms. Holland that the three-stage ultrasonic parts washer discharges via hard-pipe to a nearby floor drain (refer to Attachment 1, Photographs 12 through 14). After the inspection, Ms. Holland contacted Mr. Cook, the EHS Manager who was not present during the inspection, who stated that the facility utilizes Metal Medic in the wash and adds a dilution of Metal Medic 7152 (a phosphoric acid solution) to adjust the pH of the wastewater prior to discharge. Refer to Attachment 2 for the Metal Medic 7152 material safety data sheet (MSDS).

Mr. McMahan and Ms. Holland then proceeded to the non-woven process area of the facility. Mr. McMahan explained that the facility has three non-woven process lines, one of which was receiving maintenance and one of which was being cleaned at the time of the inspection. Mr. McMahan explained that the bales of filament produced at the facility are introduced to a bale opener and are transported by a conveyor to the grinding process. The filament is then conveyed to the distribution fan which ultimately leads to the "carding machine." The filaments are then layered for thickness and go through multiple stretching and needling processes for additional fiber strengthening. Mr. McMahan explained that wastewater is not generated from the non-woven processing operations.

Mr. McMahan stated that final products are stored near the loading docks of the facility. Mr. McMahan also stated that the warehouse has a hand sink for employee hand washing. The facility also has a maintenance shop with a hand sink.

## V. Records Review

After the opening conference and inspection of operations, Ms. Holland requested to review the last six months of water and sewer bills for the facility. Mr. McMahan stated that he would need to request this information from the Accounting Department. Mr. McMahan and Ms. Holland went to the Accounting Department, and Ms. Holland made this request to one of the facility's Account Managers. Ms. Holland provided a business card to the Account Manager and requested



that the water and sewer bills be provided to her via email. On October 2, 2015 the water and sewer bills were provided to Ms. Holland (refer to Attachment 2).

Ms. Holland also exchanged emails with Mr. Cook, the EHS Manager, after the site inspection. Ms. Holland sent a subsequent email explaining the report writing process and requesting additional information. Ms. Holland requested the facility's permit and most recent sampling data. Mr. Cook stated the facility does not have a permit from the City, but the City had collected samples of its discharge. He noted the facility has collected its own samples, and provided the sampling data and the MSDS for Metal Medic 7152 (refer to Attachment 2).

## VI. Closing Conference

After the inspection of the process and operation areas, Mr. McMahan and Ms. Holland discussed the inspection in a conference room near the lobby entrance. Ms. Holland discussed the various wastewater generating processes observed at the facility during the inspection. She mentioned that she may have follow up questions for the facility's EHS Manager, and would contact him if needed. Ms. Holland exited the facility at 2:46 P.M.

## VII. Findings

- A. The facility has been manufacturing textile goods as well as synthetic fibers since 1994. The synthetic fibers operation generates and discharges wastewater to the City's POTW from recycled overflow of the recycling fibers process (NGR machine overflow and steam condensate from the extruder), wash water from the facility's plate washing process, and general condensate from the crimper machines. The facility does not discharge wastewater from its cooling system, which operates on a closed loop.

According to the regulations at 40 C.F.R. §§ 403, 414.11 and 414.30, process wastewater discharges resulting from the manufacture of polypropylene fibers are subject to federal pretreatment standards and requirements. A significant portion of the facility's operations appear to fit the standard industrial classification code 2824, which would impart coverage by the standards.

- B. The facility may be considered an SIU, either due to discharges of categorical wastewater or due to the potential for discharges to have a negative impact on the POTW. The facility has not been monitoring its discharges and reporting associated data to the control authority, which is the State of Georgia. SIUs are required to monitor and report on their wastewater discharges to the control authority per 40 C.F.R. § 403.12.
- C. As previously mentioned, after the inspection, the EHS Manager provided information and documentation to Ms. Holland regarding wastewater generation and disposal practices. Mr. Cook provided a MSDS to Ms. Holland for Metal Medic 7152, and explained that a dilution of this chemical was used to lower the pH of the wastewater generated from the three-stage ultrasonic wash prior to discharge. In reviewing the MSDS, Ms. Holland noted that the main



chemical in the Metal Medic 7152 is phosphoric acid which is used as an industrial cleaner and/or for surface preparation of the metal. In the event that the facility applies the diluted Metal Medic 7152 solution to metal and generates and discharges wastewater from this process, the facility may also be subject to the regulations at 40 C.F.R. Part 433, Metal Finishing. Further investigation is needed to confirm the wastewater generating processes at the facility and which solutions are used in the metal plate washing process.

- D. During the inspection of the process area, Ms. Holland observed fiber debris around the floor drain which received condensate from the crimping machine (refer to Attachment 1, Photograph 7).

### VIII. Recommendations

- A. The facility needs to contact the State of Georgia and submit a SIU permit application. As the pretreatment program Control Authority, the State of Georgia may conduct a follow up inspection at the facility and meet with the appropriate representatives to confirm the facility's process operations that generate wastewater.
- B. The facility's undiluted synthetic fibers process wastewaters need to be sampled to compare against the Pretreatment Standards for New Sources provided in 40 C.F.R. § 414.36, Organic Chemicals, Plastics, and Synthetic Fibers (Other Fibers). The facility's metal plate washing process should be further evaluated to identify if categorical wastewater is generated. Similar sampling of metals process wastewaters may be needed to compare against the Part 433 standards. All of these results need to be reported to the State of Georgia.
- C. The facility needs to ensure that good housekeeping practices are performed, and may need to discuss a slug discharge control plan with the State of Georgia. This should include ensuring the filament debris is kept from entering the floor drain so it will not cause issues (i.e., accumulation and blockages) downstream within the POTW.

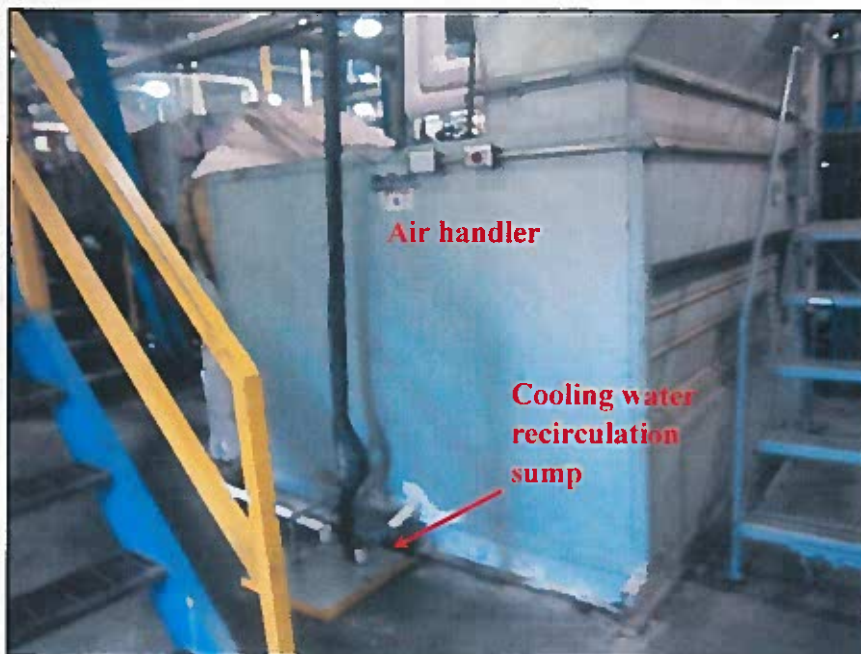
### IX. Figures

Attachment 1	Photograph Log
Attachment 2	Document Log

**Attachment 1**  
**TenCate Geosynthetics**  
**Photograph Log**



**Photograph 1.** View, facing east, of the facility's sign located to the east of the facility's main entrance.



**Photograph 2.** View of the facility's air handler located in the process area.



**Photograph 3.** Up-close view of the facility's cooling water recirculation pump depicted in Photograph 2.



**Photograph 4.** View of the chillers used for the closed-loop chiller system located outdoors in the northeast area of the facility.



**Photograph 5.** View of the facility's crimper machine. Note the vicinity of the crimping machine to the floor drain in the foreground of the photograph.



**Photograph 6.** Up-close view of the water applied to the filament at the crimper machine.

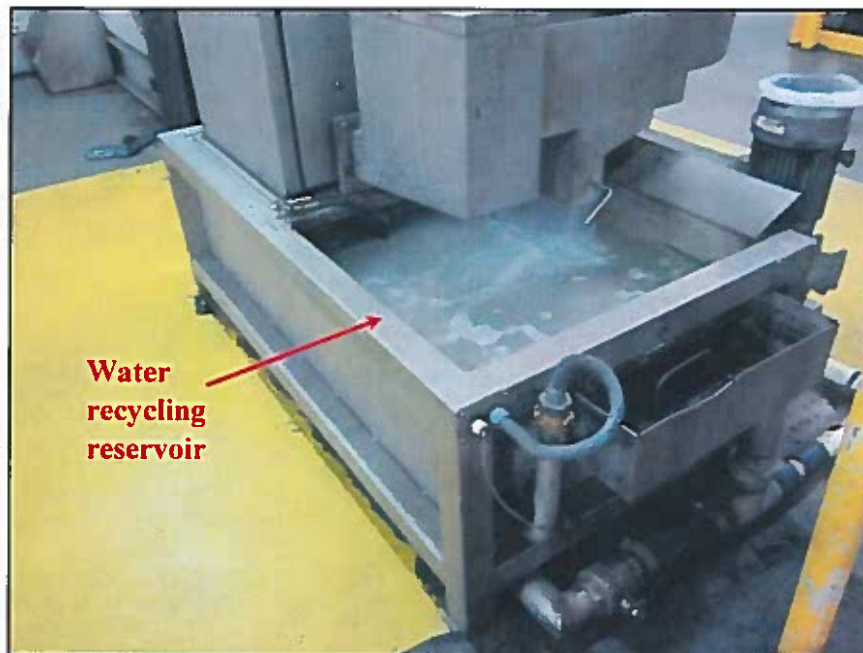




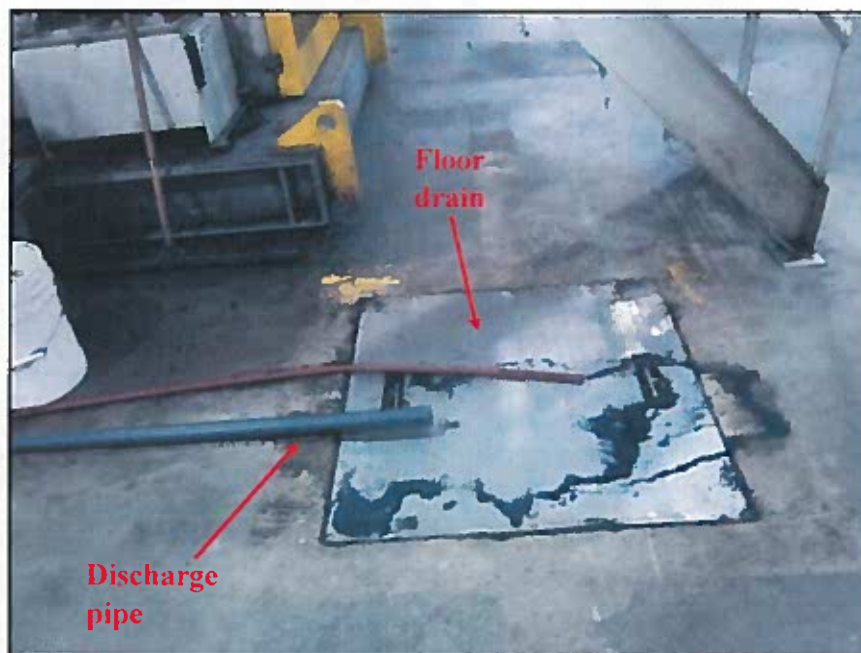
**Photograph 7.** View of condensate from the crimping machine discharging to a floor drain. Note the debris accumulated around the drain.



**Photograph 8.** View of the pellets separator and NGR recycling washing machine. Note the overflow from the machine leads to a nearby floor drain (no depicted).

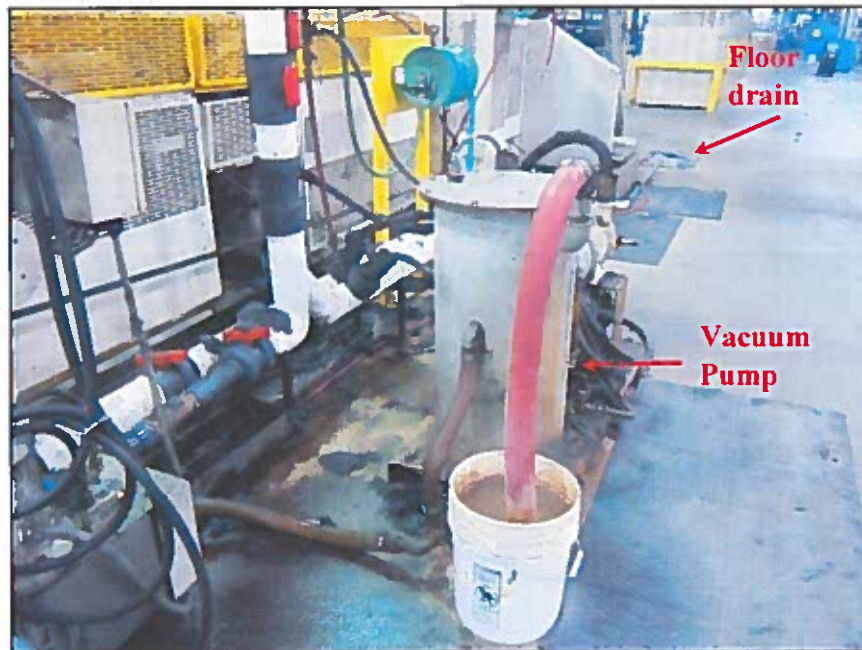


**Photograph 9.** Up-close view of the water recycling reservoir used for the pelletization process.



**Photograph 10.** View of the discharge pipe used to transport overflow from the NGR recycling washing machine (depicted in Photograph 8) to the floor drain .





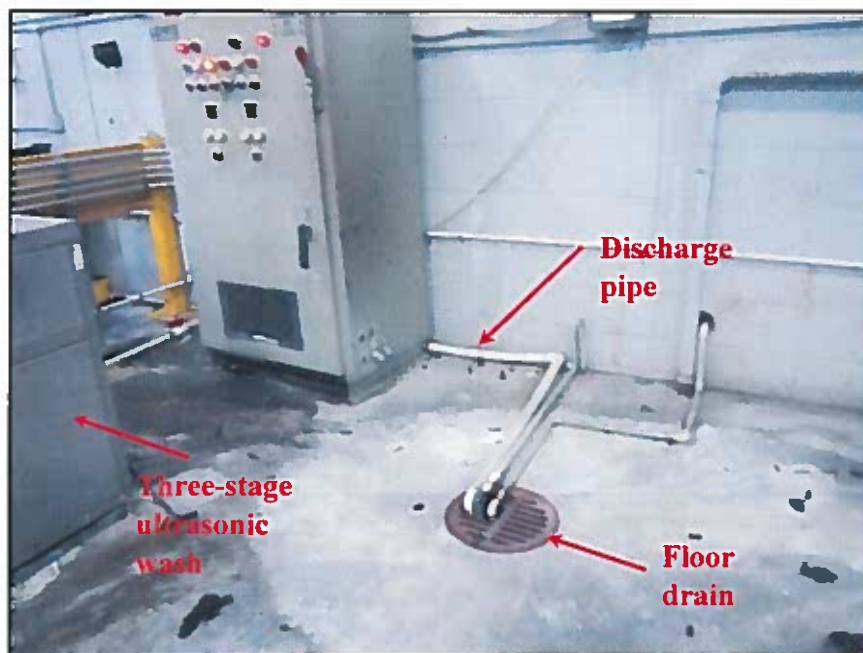
**Photograph 11.** View of the vacuum pump for the extruder barrel. Note the floor drain depicted in Photograph 10 shown in the background of the photograph.



**Photograph 12.** View of the facility's three-stage ultrasonic wash.



**Photograph 13.** View of the back of the three-stage ultrasonic wash depicted in Photograph 12. Note the piping leading from the back of the machine to the discharge pipe, toward the wall.



**Photograph 14.** View of the discharge pipe from the three-stage ultrasonic wash leading into a nearby floor drain.

**Attachment 2**  
**TenCate Geosynthetics**  
**Document Log**

**Attachment 2.A**  
**TenCate Geosynthetics**  
**Sewer Bills**

City of Jefferson  
Billing Office  
147 Athens Street  
Jefferson, GA 30549

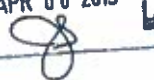


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3407



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365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

ACCOUNT NUMBER 2805		PLANT Q1		CY 00		RT 04		FOLD 010150		SERVICE FROM 02/16/2015		SERVICE TO 03/16/2015		DAYS 28	
PRIOR READING		CURRENT READING		USAGE		TYPE OF SERVICE						AMOUNT			
						***BALANCES 30 DAYS OR MORE PAST DUE ARE SUBJECT TO DISCONNECT WITHOUT FURTHER NOTICE***									
23090		24100		107960		INSIDE WAT						799.80			
742390		752085		0								0.00			
0		0		107960		SEWER						514.20			
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TOTAL												1313.80			
DUE ON RECEIPT															
Service Address				365 SOUTH HOLLAND				PAST DUE TOTAL DUE				319115 pd \$1654.70		1,820.17 2133.97	

ALL PAST DUE BALANCES 30 DAYS OR OLDER ARE SUBJECT TO DISCONNECT WITHOUT FURTHER NOTICE.

IF YOU ARE DISCONNECTED FOR NON-PAYMENT, ALL PAST DUE BALANCES PLUS A \$ 80.00 RECONNECT FEE MUST BE PAID BEFORE SERVICE IS RESTORED.

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DETACH AND RETURN THIS PORTION WITH PAYMENT

BILLED ON 03/31/2015

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ACCOUNT NUMBER  
2805

DUE DATE  
DUE UPON RECEIPT

365 SOUTH HOLLAND



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PAY THIS AMOUNT  
BY DUE DATE

3,133.97

PAY THIS AMOUNT  
AFTER DUE DATE

3,265.35

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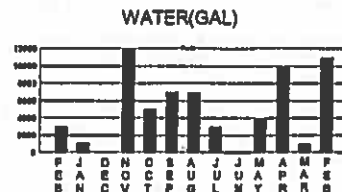


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385 S HOLLAND DR  
PENDERGRASS GA 30567-4625

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DUE ON RECEIPT			TOTAL			1022.45	
Service Address 365 SOUTH HOLLAND			PAST DUE 3/9/15 pd \$990			1,089.00	
			TOTAL DUE			2111.45	

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SUBJECT TO DISCONNECT WITHOUT FURTHER  
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RECONNECT FEE MUST BE PAID BEFORE SERVICE  
IS RESTORED.

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BILLED ON 03/31/2015  
ACCOUNT NUMBER 2686  
DUE DATE  
DUE UPON RECEIPT

365 SOUTH HOLLAND



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BY DUE DATE

2,111.45

PAY THIS AMOUNT  
AFTER DUE DATE

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PENDERGRASS GA 30567-4825

ACCOUNT NUMBER 2805		PLANT 01	CY 00	RT 04	FOLIO 010150	SERVICE FROM 03/18/2015	SERVICE TO 04/15/2015	DAYS 30
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Service Address		365 SOUTH HOLLAND				TOTAL DUE		1340.40

A/S

608  
RECEIVED  
MAY 01 2015  
BY: [Signature]

THE 2014 WATER QUALITY REPORT IS AVAILABLE AT  
<http://www.cityofjeffersonga.com/files/buildercontent/site/builderfiles/jeffersonccr201405082015.pdf>  
AND ON THE CITY WEBSITE.

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PENDERGRASS GA 30587-4625

ACCOUNT NUMBER 2886	PLANT 01	CY 00	RT 04	FOLIO 010175	SERVICE FROM 03/18/2015	SERVICE TO 04/15/2015	DAYS 30	3,804
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Service Address		385 SOUTH HOLLAND				TOTAL DUE	1072.50	

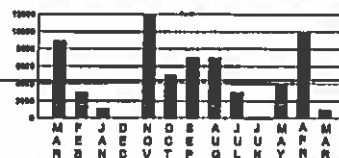
AIS RECEIVED  
MAY 01 2015  
BY: [Signature]

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<http://www.cityofjeffersonga.com/sitebuildercontent/sitebuilderfiles/jeffersonccr201405082015.pdf>  
AND ON THE CITY WEBSITE.

ALL BALANCES 30 DAYS OR MORE PAST DUE ARE  
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NOTICE. PLEASE PAY ALL PAST DUE BALANCES BY  
THE 15TH OF THE MONTH.

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365 S HOLLAND DR  
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ACCOUNT NUMBER 2605	PLANT 01	QY 00	RT 04	FOLIO 010150	SERVICE FROM 04/15/2015	SERVICE TO 05/15/2015	DAYS 30	3,822
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A/S 603  
RECEIVED  
JUN 01 2015  
BY: [Signature]

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RECONNECT FEE MUST BE PAID BEFORE SERVICE  
IS RESTORED.

PAYMENT OPTIONS - SEE BACK FOR DETAILS

WATER(GAL)



KEEP THIS COPY FOR YOUR RECORDS

DETACH AND RETURN THIS PORTION WITH PAYMENT

BILLED ON 05/31/2015

ACCOUNT NUMBER 2605

DUE DATE 06/15/2015

T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

365 SOUTH HOLLAND



Billing Office is located on the lower level. Parking is behind City Hall.

PAY THIS AMOUNT  
BY DUE DATE

1,306.10

PAY THIS AMOUNT  
AFTER DUE DATE

1,436.71

City of Jefferson  
Billing Office  
147 Athens Street  
Jefferson, GA 30549




Phone (706) 387-5121 ext 1  
www.cityofjeffersonga.com  
Office hrs 8:00 am - 4:30 pm



\*\*\*\*\*AUTO\*\*SCH 5-DIGIT 30549 18 18  
|||||

T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

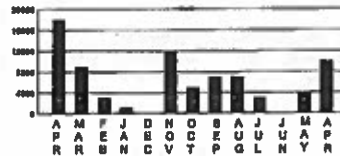
ACCOUNT NUMBER 2686		PLANT 01	CY 00	RT 04	FOLIO 010175	SERVICE FROM 04/15/2015	SERVICE TO 05/15/2015	DAYS 30	3,823
PRIOR READING	CURRENT READING	USAGE	TYPE OF SERVICE				AMOUNT		
488 5800	488 5830	3000 0	INSIDE WAY				990.00 0.00		
				A/S 604 RECEIVED JUN 01 2015 BY: 					
TOTAL								990.00	
Service Address		365 SOUTH HOLLAND				TOTAL DUE		990.00	

ALL PAST DUE BALANCES 30 DAYS OR OLDER ARE  
SUBJECT TO DISCONNECT WITHOUT FURTHER  
NOTICE.

IF YOU ARE DISCONNECTED FOR NON-PAYMENT,  
ALL PAST DUE BALANCES PLUS A \$50.00  
RECONNECT FEE MUST BE PAID BEFORE SERVICE  
IS RESTORED.

PAYMENT OPTIONS - SEE BACK FOR DETAILS

WATER(GAL)



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T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

BILLED ON 05/31/2015  
ACCOUNT NUMBER 2686 DUE DATE 06/15/2015

365 SOUTH HOLLAND



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PAY THIS AMOUNT  
BY DUE DATE

990.00

PAY THIS AMOUNT  
AFTER DUE DATE

1,089.00

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Jefferson, GA 30549



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\*\*\*\*\*AUTO\*\*SCH 5-DIGIT 30549 17 18  
T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30667-4625

ACCOUNT NUMBER 2805		PLANT 01		CY 00	RT 04	FOLIO 010150	SERVICE FROM 05/15/2015	SERVICE TO 08/15/2015	DAYS 31
PRIOR READING	CURRENT READING	USAGE	TYPE OF SERVICE				AMOUNT		
24330	25010	172800	INSIDE WAY				1,318.40		
771510	781980	0					0.00		
0	0	172800	SEWER				903.30		
TOTAL									2221.70
Service Address		365 SOUTH HOLLAND				TOTAL DUE		2221.70	

ALL PAST DUE BALANCES 30 DAYS OR OLDER ARE  
SUBJECT TO DISCONNECT WITHOUT FURTHER  
NOTICE.

IF YOU ARE DISCONNECTED DUE TO  
NONPAYMENT, THE TOTAL BALANCE AND A \$ 50.00  
RECONNECT FEE MUST BE PAID BEFORE SERVICE  
IS RESTORED.

PAYMENT OPTIONS - SEE BACK FOR DETAILS

WATER(GAL)



KEEP THIS COPY FOR YOUR RECORDS  
DETACH AND RETURN THIS PORTION WITH PAYMENT

T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30667-4625

491  
**RECEIVED**  
JUL 06 2015  
BY:

BILLED ON 08/30/2015  
ACCOUNT NUMBER 2805  
DUE DATE 07/15/2015

365 SOUTH HOLLAND



Billing Office is located on the lower level. Parking is behind City Hall.

PAY THIS AMOUNT  
BY DUE DATE  
2,221.70  
PAY THIS AMOUNT  
AFTER DUE DATE  
2,443.87

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Jefferson, GA 30549



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3407



\*\*\*\*\*AUTO\*\*SCH 5-DIGIT 30549 17 18  
|||||

T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

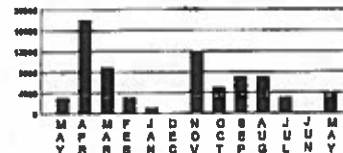
ACCOUNT NUMBER 2686	PLANT 01	CY 00	RT 04	FOLIO 010175	SERVICE FROM 05/15/2015	SERVICE TO 06/15/2016	DAYS 31	3,821
PRIOR READING	CURRENT READING	USAGE	TYPE OF SERVICE				AMOUNT	
488	400	3000	INSIDE WAT				990.00	
5830	5840	0					0.00	
TOTAL							990.00	
Service Address		365 SOUTH HOLLAND			TOTAL DUE		990.00	

ALL PAST DUE BALANCES 30 DAYS OR OLDER ARE  
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IF YOU ARE DISCONNECTED DUE TO  
NONPAYMENT, THE TOTAL BALANCE AND A \$ 50.00  
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PAYMENT OPTIONS - SEE BACK FOR DETAILS

WATER(GAL)



KEEP THIS COPY FOR YOUR RECORDS

DETACH AND RETURN THIS PORTION WITH PAYMENT

T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

490  
**RECEIVED**  
JUL 06 2015  
BY: *[Signature]*

BILLED ON 06/30/2015  
ACCOUNT NUMBER 2686  
DUE DATE 07/15/2015

365 SOUTH HOLLAND



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PAY THIS AMOUNT  
BY DUE DATE

990.00

PAY THIS AMOUNT  
AFTER DUE DATE

1,089.00

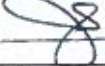
City of Jefferson  
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\*\*\*\*\*AUTO\*\*SCH 5-DIGIT 30549 12 10  
T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

ACCOUNT NUMBER 2805		PLANT 01	CY 00	RT 04	FOLIO 010180	SERVICE FROM 06/15/2015	SERVICE TO 07/15/2015	3,789 DAYS 30
PRIOR READING	CURRENT READING	USAGE	TYPE OF SERVICE			AMOUNT		
25010	25920	105400	INSIDE WAT			1,490.20		
781990	792430	0				0.00		
0	0	195400	SEWER			1,038.90		
			677 RECEIVED AUG 04 2015 BY: 					
TOTAL						2538.10		
Service Address		365 SOUTH HOLLAND				TOTAL DUE		2538.10

677  
**RECEIVED**  
AUG 04 2015  
BY:

ALL PAST DUE BALANCES 30 DAYS OR OLDER ARE  
SUBJECT TO DISCONNECT WITHOUT FURTHER  
NOTICE.

IF YOU ARE DISCONNECTED DUE TO  
NONPAYMENT, THE TOTAL BALANCE AND A \$ 50.00  
RECONNECT FEE MUST BE PAID BEFORE SERVICE  
IS RESTORED.

PAYMENT OPTIONS - SEE BACK FOR DETAILS

WATER(GAL)



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T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

BILLED ON 07/31/2015  
ACCOUNT NUMBER 2805  
DUE DATE 08/17/2015

365 SOUTH HOLLAND



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PAY THIS AMOUNT  
BY DUE DATE

2,538.10

PAY THIS AMOUNT  
AFTER DUE DATE

2,791.91

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\*\*\*\*\*AUTO\*\*SCH 5-DIGIT 30549 12 10

T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

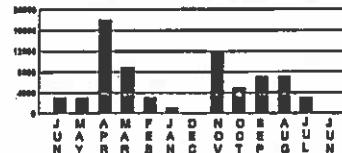
ACCOUNT NUMBER 2886	PLANT 01	CY 00	RT 04	FOLD 010175	SERVICE FROM 08/15/2015	SERVICE TO 07/15/2015	DAYS 30
PRIOR READING	CURRENT READING	USAGE	TYPE OF SERVICE			AMOUNT	
490 5840	495 5940	15000 0	INSIDE WAT			1,056.00 0.00	
			A/S 678 RECEIVED AUG 04 2015 BY: [Signature]				
TOTAL						1056.00	
Service Address		365 SOUTH HOLLAND		TOTAL DUE		1056.00	

ALL PAST DUE BALANCES 30 DAYS OR OLDER ARE  
SUBJECT TO DISCONNECT WITHOUT FURTHER  
NOTICE.

IF YOU ARE DISCONNECTED DUE TO  
NONPAYMENT, THE TOTAL BALANCE AND A \$ 50.00  
RECONNECT FEE MUST BE PAID BEFORE SERVICE  
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PAYMENT OPTIONS - SEE BACK FOR DETAILS

WATER(GAL)



KEEP THIS COPY FOR YOUR RECORDS

DETACH AND RETURN THIS PORTION WITH PAYMENT

T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

BILLED ON 07/31/2015  
ACCOUNT NUMBER 2886  
DUE DATE 08/17/2015

365 SOUTH HOLLAND



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PAY THIS AMOUNT  
BY DUE DATE

1,056.00

PAY THIS AMOUNT  
AFTER DUE DATE


1,181.60



3407



T C MIRAFI NICOLON  
386 S HOLLAND DR  
PENDERGRASS GA 30567-4825

A/S 667  
RECEIVED  
AUG 31 2005  
BY: 

**IF YOU ARE DISCONNECTED DUE TO NONPAYMENT, THE TOTAL BALANCE AND A \$ 50.00 RECONNECT FEE MUST BE PAID BEFORE SERVICE IS RESTORED.**

WATER(GAL)



DETACH AND RETURN THIS PORTION WITH PAYMENT

ACCOUNT NUMBER	DUE DATE
2605	09/15/2015

365 SOUTH HOLLAND



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PAY THIS AMOUNT BY DUE DATE	1.483.80
PAY THIS AMOUNT AFTER DUE DATE	1.632.29


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Jefferson, GA 30549



3407  
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\*\*\*\*\*AUTO\*\*SCH 5-DIGIT 30549 18 18  
T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

ACCOUNT NUMBER 2688		PLANT 01	CY 00	RT 04	FOLIO 010175	SERVICE FROM 07/15/2015	SERVICE TO 08/14/2015	DAYS 30	3,884
PRIOR READING	CURRENT READING	USAGE	TYPE OF SERVICE				AMOUNT		
485	488	13000	INSIDE WAT				1,045.00		
5940	6040	0					0.00		
				A/S 668 RECEIVED BY 					
TOTAL								1045.00	
Service Address		365 SOUTH HOLLAND				TOTAL DUE		1045.00	

ALL PAST DUE BALANCES 30 DAYS OR OLDER ARE  
SUBJECT TO DISCONNECT WITHOUT FURTHER  
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NONPAYMENT, THE TOTAL BALANCE AND A \$ 50.00  
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PAYMENT OPTIONS - SEE BACK FOR DETAILS

WATER(GAL)



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DETACH AND RETURN THIS PORTION WITH PAYMENT

T C MIRAFI NICOLON  
365 S HOLLAND DR  
PENDERGRASS GA 30567-4625

BILLED ON 08/31/2015  
ACCOUNT NUMBER 2688 DUE DATE 09/15/2015

365 SOUTH HOLLAND



Billing Office is located on the lower level. Parking is behind City Hall.

PAY THIS AMOUNT  
BY DUE DATE

1,045.00

PAY THIS AMOUNT  
AFTER DUE DATE

1,149.50

**Attachment 2.B**  
**TenCate Geosynthetics**  
**Analytical Sampling Collected by the Facility**



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

January 21, 2015

Mr. Bill Sams  
Ten Cate Nicolson  
365 S. Holland Drive  
Pendergrass GA 30567

TEL: (706) 693-2226  
FAX:

RE: Compliance Samples

Dear Mr. Bill Sams:

Order No: 1501854

Analytical Environmental Services, Inc. received 2 samples on 1/14/2015 10:10:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/14-06/30/15.  
-AIHA-LAP, LLC Laboratory ID: 100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) Direct Examination, effective until 09/01/15.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Elma Hadzic  
Project Manager

1501854

**ANALYTICAL ENVIRONMENTAL SERVICES, INC.**  
 3080 Presidential Drive, Atlanta GA 30340-3704  
 A/E/S TEL: (770) 457-4177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-5188

**CHAIN OF CUSTODY**

Work Order: **65137**

Date: **1/15/15** Page **1** of **1**

CLIENT				ANALYSIS REQUESTED				REMARKS	
TENATE GEOSYNTHETICS 1283 OLD CLEVELAND RD CORNELIUS				PRESERVATION (See notes)				Visit our website www.tenate.com to check on the status of your results, place bottle orders, etc.	
#	SAMPLE ID	DATE		TIME	CLUB	COMPOSITE	ANALYST	REMARKS	
		DATE	TIME						
1	EXT 3 BED	1/13/15			X				
2	EXT 3 N.A. Phos	"			X				
3	EXT 3 PH	"			X				
4	EXT 35 BED	"			X				
5	EXT 35 N.A. Phos	"			X				
6	EXT 35 PH	"			X				
7									
8									
9									
10									
11									
12									
13									
14									

RECEIVED BY		DATE/TIME		RECEIVED BY		DATE/TIME	
W.D. Amos 1/15/15		1/15/15 10:10		T. Clevins 1/15/15		1/15/15 10:10	

PROJECT INFORMATION		RECEIPT	
PROJECT NAME: PROCESS WATER STUDY		Total # of Containers	
PROJECT #:		Threatened Time Periods	
SITE ADDRESS:		Standard 5 Business Days	
SEND REPORT TO: W.D. Amos		Next Business Day Rush	
INVOICE TO: SAME		Next Business Day Rush	
IF DIFFERENT FROM ABOVE		Same Day Rush (with req)	
		Other	
		STATE PROGRAM (if any)	
		Fees: Y/N: Fee: Y/N	
		DATA PACKAGE: I B III IV	

SAMPLES RECEIVED AFTER 3PM ON SATURDAY ARE CONSIDERED RECEIVED THE NEXT BUSINESS DAY. IF THE ABOVE TIME IS NOT INDICATED, ALL WILL PROCEED WITH STANDARD RATE OF SAMPLES.  
 MATRIX CODES: A = Air, GH = Groundwater, SS = Sediment, SO = Soil, SW = Surface Water, W = Water (Drinks), DW = Drinking Water (Drinks), O = Other (Specify), WH = Waste Water  
 PRESERVATIVE CODES: H-1 = Hydrochloric acid - for 1+ for only, N = Nitric acid, S-1 = Sulfuric acid - for 5/4/4/1 = Sodium Borohydride, A = Ammonia, B = Boric acid, C = Citric acid, D = Dithionite, E = Ethanol, F = Formaldehyde, G = Glacial Acetic Acid, H = Hydrochloric Acid, I = Iodine, J = Hydrofluoric Acid, K = Potassium Dichromate, L = Lead, M = Manganese, N = Nitric Acid, O = Other (Specify), P = Phosphoric Acid, Q = Potassium Dichromate, R = Rhodium, S = Sulfuric Acid, T = Tantalum, U = Uranic Nitrate, V = Vanadic Acid, W = Water (Drinks), X = Xylene, Y = Yttrium, Z = Zinc  
 While Copy - Original, Yellow Copy - Client

**Analytical Environmental Services, Inc**

**Date:** 21-Jan-15

**Client:** Ten Cate Nicolon  
**Project:** Compliance Samples  
**Lab ID:** 1501854

**Case Narrative**

Collection time for samples 1501854 was collected from the sample containers.

pH Analysis by Method E150.1/SM4500 H+ B:

Sample for pH analysis by Method E150.1/SM4500 H+ B was received and analyzed outside holding time requirement of "immediate or 15 minutes".

## Analytical Environmental Services, Inc

Date: 21-Jan-15

Client: Ten Cate Nicolson  
 Project Name: Compliance Samples  
 Lab ID: 1501854-001

Client Sample ID: EXT 3  
 Collection Date: 1/13/2015 9:38:00 AM  
 Matrix: Aqueous

Analytes	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>Total Phosphorus E365.1</b>								
				(E365.1)				
Phosphorus, Total (As P)	0.090	0.050		mg/L	201726	1	01/16/2015 14:02	FS
<b>Nitrogen, Ammonia (as N) E350.1</b>								
				(E350.1)				
Nitrogen, Ammonia (As N)	BRL	0.200		mg/L	201784	1	01/16/2015 21:25	ME
<b>Hydrogen Ion (pH) by SM4500 II+ B</b>								
pH	7.32	0.0100	H	pH Units	R284002	1	01/20/2015 16:10	OM
<b>Biochemical Oxygen Demand (5 Day) by SM5210B</b>								
Biochemical Oxygen Demand	BRL	5.0		mg/L	201941	1	01/14/2015 10:00	CH

**Qualifiers:**

- \* Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit



Analytical Environmental Services, Inc

Date: 21-Jan-15

Client: Ten Cate Nicolson  
Project Name: Compliance Samples  
Lab ID: 1501854-002

Client Sample ID: EXT 5  
Collection Date: 1/13/2015 9:36:00 AM  
Matrix: Aqueous

Analytes	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>Total Phosphorus E365.1</b>								
					(E365.1)			
Phosphorus, Total (As P)	0.145	0.050		mg/L	201726	1	01/16/2015 14:02	FS
<b>Nitrogen, Ammonia (as N) E350.1</b>								
					(E350.1)			
Nitrogen, Ammonia (As N)	BRL	0.200		mg/L	201784	1	01/16/2015 21:26	ME
<b>Hydrogen Ion (pH) by SM4500 II+ B</b>								
pH	7.12	0.0100	H	pH Units	R284002	1	01/20/2015 16:10	OM
<b>Biochemical Oxygen Demand (5 Day) by SM5210B</b>								
Biochemical Oxygen Demand	BRL	5.0		mg/L	201941	1	01/14/2015 10:00	CH

Qualifiers:

- \* Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Ten Cote Nicolas Work Order Number 1501854

Checklist completed by [Signature] Date 1/15/15

Carrier name: FedEx ☐ UPS ☒ Courier ☐ Client ☐ US Mail ☐ Other ☐

Shipping container/cooler in good condition? Yes ☒ No ☐ Not Present ☐

Custody seals intact on shipping container/cooler? Yes ☒ No ☐ Not Present ☐

Custody seals intact on sample bottles? Yes ☒ No ☐ Not Present ☐

Container/Temp Blank temperature in compliance? ( $0^{\circ}\leq 6^{\circ}\text{C}$ ) \* Yes ☒ No ☐

Cooler #1 316 Cooler #2 ☐ Cooler #3 ☐ Cooler #4 ☐ Cooler #5 ☐ Cooler #6 ☐

Chain of custody present? Yes ☒ No ☐

Chain of custody signed when relinquished and received? Yes ☒ No ☐

Chain of custody agrees with sample labels? Yes ☐ No ☒

Samples in proper container/bottle? Yes ☒ No ☐

Sample containers intact? Yes ☒ No ☐

Sufficient sample volume for indicated test? Yes ☒ No ☐

All samples received within holding time? Yes ☐ No ☒

Was TAT marked on the COC? Yes ☐ No ☒

Proceed with Standard TAT as per project history? Yes ☒ No ☐ Not Applicable ☐

Water - VOA vials have zero headspace? No VOA vials submitted ☒ Yes ☐ No ☐

Water - pH acceptable upon receipt? Yes ☒ No ☐ Not Applicable ☐

Adjusted? ☐ Checked by JB  
Sample Condition: Good ☒ Other(Explain) ☐

(For diffusive samples or AIHA lend) Is a known blank included? Yes ☐ No ☒

See Case Narrative for resolution of the Non-Conformance.

\* Samples do not have to comply with the given range for certain parameters.

\\aes\_server\\Sample Receipt\\My Documents\\COCs and pH Adjustment Sheet\\Sample\_Cooler\_Receipt\_Checklist\_Rev1.rtf

Analytical Environmental Services, Inc

Date: 23-Jan-15

Client: Ten Cate Nicolon  
Project Name: Compliance Samples  
Lab Order: 1501854

Dates Report

Lab Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date
1501854-001A	EXT 3	1/13/2015 9:38:00AM	Aqueous	Nitrogen, Ammonia (as N)		1/16/2015 3:05:00 PM	01/16/2015
1501854-001A	EXT 3	1/13/2015 9:38:00AM	Aqueous	Phosphorus, Total		1/15/2015 11:35:00 AM	01/16/2015
1501854-001C	EXT 3	1/13/2015 9:38:00AM	Aqueous	Biochemical Oxygen Demand by SM5210		1/14/2015 1:00:00 PM	01/14/2015
1501854-001C	EXT 3	1/13/2015 9:38:00AM	Aqueous	Hydrogen Ion (pH) by SM4500 H+ B			01/20/2015
1501854-002A	EXT 5	1/13/2015 9:36:00AM	Aqueous	Nitrogen, Ammonia (as N)		1/16/2015 3:05:00 PM	01/16/2015
1501854-002A	EXT 5	1/13/2015 9:36:00AM	Aqueous	Phosphorus, Total		1/15/2015 11:35:00 AM	01/16/2015
1501854-002C	EXT 5	1/13/2015 9:36:00AM	Aqueous	Biochemical Oxygen Demand by SM5210		1/14/2015 1:00:00 PM	01/14/2015
1501854-002C	EXT 5	1/13/2015 9:36:00AM	Aqueous	Hydrogen Ion (pH) by SM4500 H+ B			01/20/2015

## Analytical Environmental Services, Inc

Date: 21-Jan-15

Client: Ten Cate Nicolson  
 Project Name: Compliance Samples  
 Workorder: 1501854

## ANALYTICAL QC SUMMARY REPORT

BatchID: 201726

Sample ID: MB-201726	Client ID:					Units: mg/L	Prep Date: 01/15/2015		Run No: 283830		
SampleType: MBLK	TestCode: Total Phosphorus	E345.1					BatchID: 201726	Analysis Date: 01/16/2015		Seq No: 6016448	
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Phosphorus, Total (As P)	BRL	0.050									

Sample ID: LCS-201726	Client ID:					Units: mg/L	Prep Date: 01/15/2015		Run No: 283830		
SampleType: LCS	TestCode: Total Phosphorus	E345.1					BatchID: 201726	Analysis Date: 01/16/2015		Seq No: 6016449	
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Phosphorus, Total (As P)	2.000	0.050	2.000		100	90	110				

Sample ID: 1501787-002CMS	Client ID:					Units: mg/L	Prep Date: 01/15/2015		Run No: 283830		
SampleType: MS	TestCode: Total Phosphorus	E345.1					BatchID: 201726	Analysis Date: 01/16/2015		Seq No: 6016451	
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Phosphorus, Total (As P)	3.630	0.050	2.000	1.670	98.0	90	110				

Sample ID: 1501788-004AMS	Client ID:					Units: mg/L	Prep Date: 01/15/2015		Run No: 283830		
SampleType: MS	TestCode: Total Phosphorus	E345.1					BatchID: 201726	Analysis Date: 01/16/2015		Seq No: 6016464	
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Phosphorus, Total (As P)	8.490	0.050	2.000	6.380	106	90	110				

Sample ID: 1501787-002CMSD	Client ID:					Units: mg/L	Prep Date: 01/15/2015		Run No: 283830		
SampleType: MSD	TestCode: Total Phosphorus	E345.1					BatchID: 201726	Analysis Date: 01/16/2015		Seq No: 6016452	
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Phosphorus, Total (As P)	3.680	0.050	2.000	1.670	100	90	110	3.630	1.37	20	

Qualifiers:	> Greater than Result value	< Less than Result value	B Analyte detected in the associated method blank
	BRL Below reporting limit	E Estimated (value above quantitation range)	H Holding times for preparation or analysis exceeded
	J Estimated value detected below Reporting Limit	N Analyte not NELAC certified	R RPD outside limits due to matrix
	Rpt Lim Reporting Limit	S Spike Recovery outside limits due to matrix	

## Analytical Environmental Services, Inc

Date: 21-Jan-15

Client: Ten Cate Nicolson  
 Project Name: Compliance Samples  
 Workorder: 1501854

## ANALYTICAL QC SUMMARY REPORT

BatchID: 201784

Sample ID: MB-201784	Client ID:	Units: mg/L				Prep Date: 01/16/2015		Run No: 283834			
SampleType: MBLK	TestCode: Nitrogen, Ammonia (as N) E358.1	BatchID: 201784				Analysis Date: 01/16/2015		Seq No: 6016544			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Nitrogen, Ammonia (As N)	BRL	0.200									

Sample ID: LCS-201784	Client ID:	Units: mg/L				Prep Date: 01/16/2015		Run No: 283834			
SampleType: LCS	TestCode: Nitrogen, Ammonia (as N) E358.1	BatchID: 201784				Analysis Date: 01/16/2015		Seq No: 6016545			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Nitrogen, Ammonia (As N)	5.080	0.200	5.000	0.06130	100	90	110				

Sample ID: 1501967-001BMS	Client ID:	Units: mg/L				Prep Date: 01/16/2015		Run No: 283834			
SampleType: MS	TestCode: Nitrogen, Ammonia (as N) E358.1	BatchID: 201784				Analysis Date: 01/16/2015		Seq No: 6016547			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Nitrogen, Ammonia (As N)	6.340	0.200	5.000	1.050	106	90	110				

Sample ID: 1501A24-001AMS	Client ID:	Units: mg/L				Prep Date: 01/16/2015		Run No: 283834			
SampleType: MS	TestCode: Nitrogen, Ammonia (as N) E358.1	BatchID: 201784				Analysis Date: 01/16/2015		Seq No: 6016554			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Nitrogen, Ammonia (As N)	47.00	2.00	5.000	40.80	124	90	110				S

Sample ID: 1501967-001BMSD	Client ID:	Units: mg/L				Prep Date: 01/16/2015		Run No: 283834			
SampleType: MSD	TestCode: Nitrogen, Ammonia (as N) E358.1	BatchID: 201784				Analysis Date: 01/16/2015		Seq No: 6016548			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Nitrogen, Ammonia (As N)	5.840	0.200	5.000	1.050	95.8	90	110	6.340	8.21	30	

Qualifiers: &gt; Greater than Result value

BRL Below reporting limit

J Estimated value detected below Reporting Limit

Rpt Lim Reporting Limit

&lt; Less than Result value

E Estimated (value above quantitation range)

N Analyte not NELAC certified

S Spike Recovery outside limits due to matrix

B Analyte detected on the associated method blank

H Holding times for preparation or analysis exceeded

R RPD outside limits due to matrix

## Analytical Environmental Services, Inc

Date: 21-Jan-15

Client: Ten Cate Nicolson  
 Project Name: Compliance Samples  
 Workorder: 1501854

## ANALYTICAL QC SUMMARY REPORT

BatchID: 201941

Sample ID: MB-201941	Client ID:				Units: mg/L			Prep Date: 01/14/2015	Run No: 283992		
SampleType: MBLK	TestCode: Biochemical Oxygen Demand (5 Day) by SM5210B				BatchID: 201941			Analysis Date: 01/14/2015	Seq No: 6020758		
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Biochemical Oxygen Demand	BRL	0.2									

Sample ID: LCS-201941	Client ID:				Units: mg/L			Prep Date: 01/14/2015	Run No: 283992		
SampleType: LCS	TestCode: Biochemical Oxygen Demand (5 Day) by SM5210B				BatchID: 201941			Analysis Date: 01/14/2015	Seq No: 6020759		
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Biochemical Oxygen Demand	199.8	5.0	198.0		101	85	115				

Sample ID: LCSD-201941	Client ID:				Units: mg/L			Prep Date: 01/14/2015	Run No: 283992		
SampleType: LCSD	TestCode: Biochemical Oxygen Demand (5 Day) by SM5210B				BatchID: 201941			Analysis Date: 01/14/2015	Seq No: 6020780		
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Biochemical Oxygen Demand	187.3	5.0	198.0		94.6	85	115	199.8	6.46	20	

Qualifiers:	> Greater than Result value	< Less than Result value	B Analyte detected in the associated method blank
ERL	Below reporting limit	E Estimated (value above quantitation range)	H Holding times for preparation or analysis exceeded
J	Estimated value detected below Reporting Limit	N Analyte not NELAC certified	R RPD outside limits due to matrix
Rpt Lim	Reporting Limit	S Spike Recovery outside limits due to matrix	



Analytical Environmental Services, Inc

Date: 21-Jan-15

Client: Ten Cate Nicolson  
Project Name: Compliance Samples  
Workorder: 1501854

ANALYTICAL QC SUMMARY REPORT

BatchID: R284002

Sample ID: LCS-R284002	Client ID:	Units: pH Units	Prep Date:	Run No: 284002							
SampleType: LCS	TestCode: Hydrogen Ion (pH) by SM4500 H+ B	BatchID: R284002	Analysis Date: 01/20/2015	Seq No: 6020922							
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

pH 7.050 0.0100 7.000 101 90 110

Sample ID: 1501854-001CDUP		Client ID: EXT 3		Units: pH Units		Prep Date:		Run No: 284002			
SampleType: DUP		TestCode: Hydrogen Ion (pH) by SM4500 H+ B		BatchID: R284002		Analysis Date: 01/20/2015		Seq No: 6020930			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

pH 7.340 0.0100 7.320 0.273 20 11

Qualifiers:	> Greater than Result value	< Less than Result value	B Analyte detected in the associated method blank
ERL	Below reporting limit	E Estimated (value above quantitation range)	H Holding times for preparation or analysis exceeded
J	Estimated value detected below Reporting Limit	N Analyte not NELAC certified	R RPD outside limits due to matrix
Spt Lim	Reporting Limit	S Spike Recovery outside limits due to matrix	

**END OF REPORT**

## **ENCLOSURE B**

### **INFORMATION REQUEST PURSUANT TO SECTION 308 OF THE CLEAN WATER ACT**

#### **Instructions**

1. Identify the person(s) responding to this Information Request.
2. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
3. Precede each answer with the text and the number of the Question and its subpart to which the answer corresponds.
4. All documents submitted must contain a notation indicating the Question and subpart of the Question to which they are responsive.
5. In answering each Information Request Question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.
6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA as soon as possible.
7. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.
9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
11. The EPA requests that all documents provided in an electronic format be compatible with pdf.
12. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.

13. If any Question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

### **Definitions**

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.
2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.
3. The terms “And” and “Or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
4. The term “Identify” means, with respect to a natural person, to set forth the person’s name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
5. The term “Identify” means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.
6. The term “Identify” means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
7. The term “Facility” means Royal Ten Cate (USA) Incorporated’s facility located at 365 South Holland Drive in Pendergrass, Jackson County, Georgia.
8. The term “You” and “Your” shall mean Royal Ten Cate (USA) Incorporated.
9. The term “Permit” shall mean an industrial user permit issued to the Facility by the Control Authority.
10. “Control Authority” shall have the meaning set forth in 40 C.F.R. § 403.3(f).

### Questions

1. Identify the parent corporation and all subsidiaries of the Facility, and therein the individuals owning and operating the Facility.
2. If the Facility has applied for and/or received a Permit for such discharges, then provide a timeline of the wastewater permitting history for the Facility since operations commenced, including:
  - a. the date(s) that Permit applications were either requested by the Control Authority or submitted by the Facility;
  - b. the date(s) that draft or final Permit(s) were received by the Facility; and
  - c. the date(s) that comments on such draft(s) were submitted to the Control Authority.

If the Facility has never received a Permit for the discharge of process wastewaters to a publicly owned treatment works, then please explain this in the response.

3. Provide complete copies of all communication to or from the Control Authority, and to or from the public sewer utility, which concern either authorization of the Facility's process wastewater discharge(s) or compliance problems with those discharges since operations commenced. This information should be organized in chronological order with a table of contents. Communication that only regards water/sewer service billing or payment can be excluded.
4. Provide a copy of any inspection reports, notices of violations, administrative orders, cease and desist orders, and any related correspondence from local, State or federal agencies related to the process wastewater discharge from the Facility since the discharge of process wastewater from the Facility to the public sewer began.
5. Provide a flow schematic of the Facility identifying the pathway(s) of process wastewaters, the pathway(s) of non-process wastewaters, any in-line valves/storage/appurtenances, and any points of combining flows, beginning from the source(s) of the flow to the termination points at public sewers or other locations.

Include a flow balance on the schematic identifying the current average daily flow rates of process wastewater and non-process wastewater during production. Identify the rate at each originating source, prior to each point of combining flows, and at each point of flow termination or storage. Identify the originating processes for the flows, the means of disposal at the termination points, the capacity and utilization of any storage, the flow rates in gallons per day, and whether each flow rate is measured or estimated.

6. For the following wastewater locations within the Facility, provide the complete monitoring results for the twelve months preceding the date of this Information Request, or provide the results of at least two days of complete monitoring obtained at each specified location during a

period of steady production that is representative of the Facility's average production rate for the twelve months preceding the date of this Information Request.

The monitoring and analysis may be performed by, or under contract to, the Facility. All measurements and samples must be collected and analyzed in compliance with 40 C.F.R. Part 136. All measurements and samples must be of the specified undiluted wastewaters only, and not of combined wastewaters.

Wastewater Location (A): The crimper machine discharge to the drain. Complete monitoring includes measurement of the total flow (gallons) of this wastewater on the day that samples are collected for analysis of all parameters in 40 CFR § 414.111.

Wastewater Location (B): The Next Generation Group (NGR) pellet recycling machine discharge pipe to the drain. Complete monitoring includes measurement of the total flow (gallons) of this wastewater on the day that samples are collected for analysis of all parameters in 40 C.F.R. § 414.111.

Wastewater Location (C): The three-stage ultrasonic parts washer discharge pipe to the drain. Complete monitoring includes measurement of the total flow (gallons) and field sample pH of this wastewater on the day that samples are collected for analysis of all pollutant parameters in 40 C.F.R. §§ 414.111 and 433.17.

The EPA prefers that the monitoring results be provided as a summary in an electronic spreadsheet format compatible with MS Excel. Include the following for each data point:

- a. Parameter monitored;
- b. Date monitored (month/day/year);
- c. Analytical result;
- d. Units;
- e. Analytical method used or field equipment/calibration;
- f. Sample type (grab, time-proportional composite, or flow-proportional composite);
- g. Flow rate recorded at the time of monitoring;
- h. Sampling location;
- i. Flow monitoring location; and
- j. Total daily flow.

For (e), analytical methods need only be identified for laboratory analyses; for total flow, sampling flow rate and field sample pH the Facility may identify the field testing equipment used and their calibration standards. Location descriptions for (h) and (i) should be clearly identifiable in the schematics provided in item #5 above.



7. Provide copies of all reporting made in accordance with the regulations at 40 C.F.R. § 403.12 and/or under the Permit beginning at least 90 days before discharge to the public sewer commenced until the date of this Information Request, including, but not limited to:
  - a. Baseline report, as required by 40 C.F.R. § 403.12(b);
  - b. Report on initial compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(d); and
  - c. Periodic report(s) on continuing compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(e).
8. Identify if the Facility's chiller system has cleaning cycle wastewater discharged to the sewer. If so, then provide:
  - a. The discharge frequency and estimated/measured flow of the cleaning cycle to the sewer;
  - b. The names of the chemicals used and a copy of their Safety Data Sheets; and,
  - c. The most recent monitoring results for the discharge with the chain of custody forms.
9. Identify the specific type of material or metal of which the synthetic fiber manufacturing breaker and dye plates or other parts cleaned in the ultrasonic parts washer are made.
10. Provide an explanation of each stage of the three-stage ultrasonic parts washer process at the Facility, describing the names of chemicals used and the means and frequency of waste disposal for each stage. Identify if Metal Medic 7152 is in a solution while the breaker and dye plates or other washed parts are in contact with the solution.
11. Provide the NAICS or SIC codes that the Facility uses for reporting and licensing, and the entities to whom the Facility reports them.

## ENCLOSURE C

### RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS

(40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that the EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, the EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, the EPA may make the information available to the public without any further notice to you.

40 C.F.R. § 2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to the EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by the EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.

## **NOTICE OF SECURITIES AND EXCHANGE COMMISSION REGISTRANTS' DUTY TO DISCLOSE ENVIRONMENTAL LEGAL PROCEEDINGS**

Securities and Exchange Commission regulations require companies registered with the SEC (e.g., publicly traded companies) to disclose, on at least a quarterly basis, the existence of certain administrative or judicial proceedings taken against them arising under Federal, State or local provisions that have the primary purpose of protecting the environment. Instruction 5 to Item 103 of the SEC's Regulation S-K (17 CFR 229.103) requires disclosure of these environmental legal proceedings. For those SEC registrants that use the SEC's "small business issuer" reporting system, Instructions 1-4 to Item 103 of the SEC's Regulation S-B (17 CFR 228.103) requires disclosure of these environmental legal proceedings.

If you are an SEC registrant, you have a duty to disclose the existence of pending or known to be contemplated environmental legal proceedings that meet any of the following criteria (17 CFR 229.103(5)(A)-(C)):

- A. Such proceeding is material to the business or financial condition of the registrant;
- B. Such proceeding involves primarily a claim for damages, or involves potential monetary sanctions, capital expenditures, deferred charges or charges to income and the amount involved, exclusive of interest and costs, exceeds 10 percent of the current assets of the registrant and its subsidiaries on a consolidated basis; or
- C. A governmental authority is a party to such proceeding and such proceeding involves potential monetary sanctions, unless the registrant reasonably believes that such proceeding will result in no monetary sanctions, or in monetary sanctions, exclusive of interest and costs, of less than \$100,000; provided, however, that such proceedings which are similar in nature may be grouped and described generically.

Specific information regarding the environmental legal proceedings that must be disclosed is set forth in Item 103 of Regulation S-K or, for registrants using the "small business issuer" reporting system, Item 103(a)-(b) of Regulation S-B. If disclosure is required, it must briefly describe the proceeding, "including the name of the court or agency in which the proceedings are pending, the date instituted, the principal parties thereto, a description of the factual basis alleged to underlie the proceedings and the relief sought."

You have been identified as a party to an environmental legal proceeding to which the United States government is, or was, a party. If you are an SEC registrant, this environmental legal proceeding may trigger, or may already have triggered, the disclosure obligation under the SEC regulations described above.

This notice is being provided to inform you of SEC registrants' duty to disclose any relevant environmental legal proceedings to the SEC. This notice does not create, modify or interpret any existing legal obligations, it is not intended to be an exhaustive description of the legally applicable requirements and it is not a substitute for regulations published in the Code of Federal Regulations. This notice has been issued to you for information purposes only. No determination of the applicability of this reporting requirement to your company has been made by any governmental entity. You should seek competent counsel in determining the applicability of these and other SEC requirements to the environmental legal proceeding at issue, as well as any other proceedings known to be contemplated by governmental authorities.

If you have any questions about the SEC's environmental disclosure requirements, please contact the Office of Chief Counsel in the SEC's Division of Corporation Finance. The phone number is (202) 942-2900.